

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

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|--------------------------|---|-------------------|
| EMORY STEVE BROWN, | * | CASE NUMBER: |
| | * | 3:05-CV-00681-WKW |
| Plaintiff, | * | |
| | * | |
| v. | * | |
| | * | |
| CLAIMS MANAGEMENT, INC., | * | |
| | * | |
| Defendant. | * | |

**PARTIES' JOINT MOTION TO EXTEND TIME TO CONDUCT SETTLEMENT
CONFERENCE AND FILE NOTICE CONCERNING SETTLEMENT
CONFERENCE AND MEDIATION**

COMES NOW the plaintiff, Emory Brown, and the defendant, Claims Management, Inc., by and through counsel, and hereby request that the Court extend by twenty-one (21) days the deadline for the parties to conduct the required settlement conference and file the Notice Concerning Settlement Conference and Mediation. In support of their joint motion, the parties show unto the Court as follows:

1.

On October 3, 2005, pursuant to Rule 16 of the Federal Rules of Civil Procedure, the Court entered a Uniform Scheduling Order with respect to the above-styled case. The Scheduling Order provided for the following deadlines:

- (a) deadline to file dispositive motions -- July 31, 2006, or ninety days before the pretrial hearing;
- (b) deadline to conduct a face-to-face settlement conference -- August 21,

2006, or twenty-one days after the deadline for filing dispositive motions;

- (c) deadline to file Notice Concerning Settlement Conference and Mediation - August 26, 2006, or five days after the settlement conference.

2.

On July 28, 2006, the Court granted the Parties' Joint Motion to Extend Time for Filing Dispositive Motions. The new deadline for filing dispositive motions was set for August 21, 2006.

3.

In light of the extended deadline for filing dispositive motions, the parties' request that the court similarly extend the deadlines for conducting the face-to-face settlement conference and filing the Notice Concerning Settlement Conference and Mediation. The parties propose the deadlines be extended as follows:

- (a) deadline to conduct a face-to-face settlement conference -- **September 12, 2006**, or twenty-one days after the deadline for filing dispositive motions;
- (b) deadline to file Notice Concerning Settlement Conference and Mediation - **September 17, 2006**, or five days after the settlement conference.

4.

As cause for the extension, the parties show unto the Court that scheduling conflicts have prevented the parties from engaging in the settlement conference previously. The parties also show that the case is more ripe for settlement discussion following the expiration of the deadline to file dispositive motions.

WHEREFORE, for good cause shown, the parties respectfully request that the Court extend the deadline as requested or for such other period of time as the Court deems proper.

This 22nd day of August, 2006.

Respectfully submitted,

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I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

/s/ Jeffrey A. Brown